Trans-Lake Washington Project

EIS Methodology Reports

Major Technical Committee Comments and Team Responses

Report	Agency	Representative	Comment
Air Quality			In preparation; to be presented at Technical Committee Meeting
Fisheries	USFWS	Emily Teachout	Analysis should focus on functions, illustrating surface water and temperature impacts
Fisheries	USFWS	Emily Teachout	Analysis should include impacts to hyporheic and subsurface flow and should be discussed in terms of impacts to function (fish habitat, base flow maintenance). Include discussion of existing temperatures and potential affects
Fisheries	USFWS	Emily Teachout	Appropriate stormwater BMPs will not be sufficient for mitigation - will not restore or replace impacted functions. Include creative solutions on a sub-basin scale to minimize habitat impacts.
Hazardous Materials	Seattle	Eric Chipps	Why won't hazardous material surveys be conducted? When will this be done?

Report	Agency	Representative	Comment
Land Use and Economics	Medina	Doug Schulze	Identify loss of property tax base (assessed valuation) in communities that will experience displacements.
Land Use and Economics	Medina	Doug Schulze	Address impacts to property values within 1/2 mile of project.
Noise	Medina	Doug Schulze	Construction impacts must also be addressed.
Noise	Medina	Doug Schulze	In addition to 67 dBA, increases of more than 10 dBA for 24-hour averages should be addressed.
Noise	Medina	Doug Schulze	Impacts to noise levels in classrooms of Bellevue Christian Elementary School and playground should be addressed.

Report	Agency	Representative	Comment
Recreation	Ecology	Terry Swanson	Include shoreline impacts, with respect to recreation references in SMA
Transportation	City of Bellevue	Bernard Van de Kamp	Updates to the City Transit Service Plan have been adopted and the Pedestrian and Bicycle Plan Update is available
Transportation	City of Kirkland	David Godfrey	Study should not be limited to the cap of 80 intersections or the 5% limit.
Transportation	City of Kirkland	David Godfrey	Local analysis should be quantified
Transportation	City of Kirkland	David Godfrey	How will transit travel time be quantified?
Transportation	City of Redmond	Terry Marpert	General questions regarding the level of local intersections to be evaluated
Transportation	City of Seattle	Eric Chipps	Identify intersections that are highly used by bike/pedestrians and quantitatively assess additional delay
Transportation	City of Seattle	Eric Chipps	Quantify TDM effectiveness
Transportation	University of Washington	Peter Dewey	What is the effect of treating Montlake as an arterial and not a state highway?
Transportation	University of Washington	Peter Dewey	Transit service must be included in the analysis for buses on Montlake and buses from SR520 through the University

Report	Agency	Representative	Comment
Transportation	University of Washington	Peter Dewey	Include park and ride lots in the parking study
Transportation	Yarrow Point	Leonard Newstrum	Affects on SR-520 from the I-90, I-405, and AWV projects should be included
Transportation	Yarrow Point	Leonard Newstrum	Major segments along SR 520 should be defined as those portions that go between locations where there will be significant on and off traffic.
Transportation	Yarrow Point	Leonard Newstrum	Mitigation should not only be studied for the Preliminary Preferred Alternative.
Vegetation and Wildlife	USFWS	Emily Teachout	Address any potential connectivity issues, and any potential opportunity to improve or restore connectivity or wildlife passage.
Vegetation and Wildlife	Medina	Doug Schulze	Include perch areas used for fishing/hunting by bald eagles.
Visual Quality	Ecology	Terry Swanson	Include shoreline views, in accordance with SMA
Water Resources	USFWS	Emily Teachout	Address stormwater mitigation by looking outside the box
Water Resources	USFWS	Emily Teachout	Indirect impacts should be based on modeling

Report	Agency	Representative	Comment
Water Resources	Ecology	Terry Swanson	The Sammamish River is not identified as a receiving water for which flow control is NOT required. The Sammamish River may be, and probably is, "receiving water". In the 2001 Stormwater Manual, Ecology did not designated the Sammamish River as a receiving water body that for which discharges into it were exempt from flow control. It was not designated as an exempt waterbody because we had no technical basis to exempt discharges into it from the flow control requirements.
Water Resources	Ecology	Terry Swanson	What is purpose of determining nutrient load and receiving water quality if we are not comparing to state water quality standards?

Report	Agency	Representative	Comment
Water Resources	Ecology	Terry Swanson	While it still is in development, the Ecology's Western Washington Hydrology Model (WWHM) is available for facility sizing and is superior to the spreadsheet tool for final design. The use of spreadsheets if ok for preliminary design to determine approximate volumes. However, final design and sizing of stormwater treatment and flow control should be based on Ecology's WWHM or on KCRTS.
Wetlands	Ecology	Sarah Suggs	Ecology concurs with use of WSDOT Wetland Functions Characterization Tool, but may require additional assessment using Ecology's Methods for Assessing Wetland Functions to refine the analysis if significant impacts are discovered.
Wetlands	USFWS	Emily Teachout	Recommends use of Washington State Wetland Functional Assessment Method instead of WSDOT method.
Wetlands	EPA	Freedman	Cite sources of existing wetland mapping
Wetlands	EPA	Freedman	Consider hydrologic impacts and fragmentation commonly associated with linear highway projects.

Team Response
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See next response.
The Methodology Report states that hydrologic changes and their effects on fish habitat will be qualitatively evaluated. Given the fact that the impervious surface increase is not concentrated at one location, but rather added to the margins of existing narrow and linear impervious areas, a quantitative analysis of groundwater recharge and baseflow/hyporheic reductions and the specific interrelationship between recharge and discharge at any location is outside the scope of this EIS. The Methodology Report has been modified to clarify that temperature is one of the water quality issues we will address as part of the direct impact analysis.
We assume that loss of direct natural recharge (a qualitatively diminimus amount compared to overall regional recharge) can be replaced, at least in part, through local infiltration of stormwater. The methodology report has been modified to indicate that we will coordinate with regulatory agencies to determine other appropriate mitigation measures, beyond standard BMPs, to address fish habitat impacts.
Hazardous material survey is conducted prior to demolition of structures, after final design is complete, and is not part of an EIS. The method for conducting the survey is a standard construction practice.

Team Response
The loss of property tax base (assessed value) from displacements will be estimated in the analysis of economic effects.
Impacts to property values are not addressed in an EIS analysis. Property values are more directly related to the availability of land and the manner in which development occurs in response to market factors as regulated by local development standards and comprehensive plans. In addition, there is no widely accepted forecasting model for predicting with any certainty the nature and magnitude of changes in future property values in response to transportation improvements.
Construction noise and vibration impacts will be addressed in the EIS using general construction staging assumptions from the design team.
24-hour average daily Ldn noise levels will be included in the Noise Technical Report. A 10 dBA increase will be considered for mitigation if the resulting noise level is greater than 50 dBA. Our pilot studies indicate that when there is a 10 dBA increase, a similar increase will be seen in 24-hour average noise levels.
Schools, churches and other institutional uses, such as libraries, are considered residential land uses for the purpose of the noise analysis. Outdoor locations at those sites will be monitored to determine the noise impacts. If there is an indication that indoor levels may be more than 52 dBA, then indoor monitoring will be done to determine levels and modeling done to predict levels. If predicted indoor levels are over 52 dBA, mitigation measures will be investigated.

Team Response
The Land Use section will analyze any potential conflicts to SMA policies, including any shorelines designated for recreation. If shoreline recreation impacts exist, the recreation section will discuss the impact to the facility and will refer to the Land Use section for an analysis of consistency with the SMA policy.
We have added the City Transit Service Plan to the list of Data Needs and Sources. We will ensure that we have the most up to date pedestrian plan.
We will submit the list of intersections to the Cities for their concurrence
Local analysis will be quantified
Transit travel times will be quantified using output data from the freeway analysis tool
Updates to the intersection list will be made and distributed for concurrence
Major bike/pedestrian crossings within the jurisdictions will be analyzed as described in the revised Methodology Report.
TDM affects on traffic volumes will be addressed in the report.
Montlake operates as an arterial and therefore the appropriate choices for modeling its operations is SYNCHRO.
Analysis will include project impacts to travel times for those routes.

Team Response
Park and ride lots have been included in the methodology report
Those sensitivity tests will be done and discussed in the cumulative impacts section
Length of segment has nothing to do with level of detail of model evaluation.
Mitigation for impacts to local streets will be designed and will become part of the project description. Sentences stating that mitigation will only be done for the Preliminary Preferred Alternative have been deleted.
Changes in habitat connectivity will be addressed as noted in the revised methodology report.
Perching/foraging habitat will be addressed as noted in revised methodology report.
Shoreline views will be included in the report, as noted in the revised methodology report.
See responses noted above under Fisheries
TBD

Team Response
This section states that it is assumed that local jurisdictions will successfully petition Ecology to include the Sammamish River as a receiving water. It is assumed that King County and/or the cities of Redmond, Woodinville, and Bothell will provide the technical documentation needed to demonstrate to Ecology that the Sammamish River should be exempt from flow control, prior to permitting and construction of this project. Therefore, detention for runoff discharging directly to the Sammamish River would not be required for this project.
In the EIS, pollutant loads for each alternative will be estimated to: (1) characterize the concentration and types of pollutants commonly associated with highway runoff, and (2) to form the basis for comparison between alternatives. The BMPs that will be used to treat runoff from the project are approved by Ecology and their removal rates for pollutants of concern are presumed to be adequate to meet water quality criteria; it is outside the scope of the EIS to demonstrate that approved water quality BMPs function the way they are intended. Receiving water quality will be described in the Affected Environment section of the EIS to identify any water bodies that may be water quality sensitive (such as those identified in basin plans or on the 303(d) List. An example of this would be Lake Sammamish, which has been identified as phosphorus sensitive and would require application of additional water quality treatment BMPs to remove phosphorus prior to discharge.

Team Response
Comment noted. The methodology report is not intended to address final design. Final design will be based on the most appropriate model available at the time design occurs. Runoff rates will be calculated using KCRTS and required detention volumes will be estimated using KCRTS to meet a Level 2 flow control as stated in the methodology report. These values will be converted to unit values using a spreadsheet and extrapolated for each basin and each alternative for comparative purposes. During final design the appropriate hydrologic model will be used (KCRTS or WWHM), and detention facilities will be sized for specific project designs.
Comment noted. The final design will be based on the most appropriate model available at the time design occurs.
Not consistent with Ecology's comments (see above). WSDOT assessment approach is appropriate for use on linear projects and is considered Best Available Science.
The existing conditions summary will indicate differences/similarities between the field inventory and existing wetland mapping (NWI, County inventory, etc)
The EIS will address changes in wetland hydrology and habitat that occur as a result of road construction, including effects that occur upstream or downstream of the construction area.